NOTICE OF EXEMPTION

To: Office of Planning and Research
State Clearinghouse
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From: Department of Toxic Substances Control
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Project Title: Former Univar USA Inc. Facility

Project Location – Specific: 5353 Jillson Street

Project Location – City: Commerce **Project Location – County:** Los Angeles

Description of Project:
The project consists of the construction of an interim measures soil vapor extraction treatment (SVET) system. This addresses the soil gases that have been found at a corrective action site. The primary chemicals of concern were determined to be perchloroethylene (PCE), trichloroethylene (TCE), and 1, 1 dichloroethylene (1, 1-DCE). The discovery of this contamination resulted in a Corrective Action Consent Agreement that was executed on February 14, 2002. Subsequent facility investigations conducted between 2001 and 2002 identified a groundwater plume. Although the release of free-product was remediated as part of the underground storage tank removal, the soil remains contaminated due to the migration of soil gas containing VOCs / chlorinated hydrocarbons.

The site is zoned for industrial/commercial use and is approximately 7 acres featuring two large warehouses, a yard storage area, and associated parking. The perimeter of the site is surrounded by a concrete block wall or chain-link fence. The surrounding areas to the north, east, and south of the site are zoned and developed as commercial manufacturing or heavy/industrial. There are some oil wells on Jillson Street to the south of the site. An area west of the site is zoned light multiple residential. Currently the area to the west consists of primarily single family residences and multi-family complexes.

The site has been sold to a company that uses the facility for assembly and distribution of office furniture. It is completely paved or covered with buildings, except for the rail spur along the northern site boundary and some minor landscaping along the southern end of the West Warehouse.

Project Activities: The project involves final approval of design and operation of a SVET system as interim measures. The SVET will be used for the removal of soil gas in an attempt to reduce the potential of off site vapor migration of VOCs. The SVET system will be used to address the VOC-impacted soil onsite and offsite. The SVET system uses granulated active carbon for soil vapor remediation. The project utilizes vapor extraction wells and a shallow vapor extraction trench. The major components of the SVET system include a network of vapor extraction wells and trench, vapor conveyance piping, a series of carbon adsorption vessels, and a vapor extraction blower.

Name of Public Agency Approving Project: Department of Toxic Substances Control

Name of Person or Agency Carrying Out Project: Department of Toxic Substancess Control

Exempt Status: *(check one)*
☐ Ministerial (Sec. 21080(b)(1); 15268);
☐ Declared Emergency (Sec. 21080(b)(3); 15269(A));
☐ Emergency Project (Sec. 21080(b)(4); 15269(b)(c));
☐ Categorical Exemption. State type and section number:
☐ Statutory Exemptions. State code number:

☒ General Rule (Sec. 15061(b)(3))

Exemption Title: With certainty no possibility of a significant environmental effect.

Reasons Why Project is Exempt:

The Department of Toxic Substances Control (DTSC) allowed construction of the SVET system in order to allow startup testing which was necessary for final CEQA review and determining system operation and maintenance optimization. In addition, the startup testing was required to verify system noise levels and affluent emissions and resulting potential health risks. As a result of DTSC's environmental analysis there were no significant impacts identified. Additional discussion is provided below.

- Air Quality and Human Health Risk:

The project operation will not violate any air quality standard or contribute substantially to an existing or projected air quality violation. The project will not expose sensitive receptors to substantial pollutant concentrations or create objectionable odors affecting a substantial number of people.

On June 23, 2004, South Coast Air Quality Management District (SCAQMD) granted a permit to construct and operate the equipment needed for the project. The project was conducted in accordance with all data and specifications required by SCAQMD.

Review of the Soil Vapor Extraction/Treatment System Startup Interim Soil Remediation Report, dated _____, 2005 indicates the project operation will not result in a cumulative net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard. According to the Health Risk Assessment Soil Vapor Extraction/Treatment System Revision 1, dated August 24, 2005 the emissions will be less than the deminimus level of $1x10^{-6}$ cancer risk and will not exceed a health index of 1.0. The project contribution to cumulative emissions will be less then significant.

The operation and maintenance of the SVET system includes weekly site visits to check the operation of the system, taking flow measurements and measuring inlet and outlet VOC concentrations using a photo ionization detector (PID). The SCAQMD requires that a carbon change-out occur when the TOC exceeds 15 parts per million by volume (ppmv) in the tertiary vessel. Since April 4, 2005, when the SVET system began startup testing, there were seven occasions in which carbon change-outs occurred following the breakthrough (carbon saturation) in the tertiary vessel. On every occasion in which a change-out occurred carbon was replaced in the primary, secondary or both vessels. There were no adverse effects to the on-site workers or off-site receptors during the carbon change-outs. The trucks involved in the carbon change-outs were restricted to commercial and industrial areas, avoiding residential neighborhoods. A health risk assessment was performed to estimate the potential health impacts to the nearest residential and off-site worker receptors based on concentrations of VOCs in the treatment system effluent measured during the startup phase. The calculations assume the worst-case scenario where emissions are released 24 hours per day, 365 days per year. According to the maximum individual cancer risk (MICR) calculations performed, the total MICR values for the residential and off-site workers receptors are 0.16 in a million and 0.061 in a million, respectively. According to the recent HRA, the MICR was below the "one in a million" target. In addition, the calculations for the chronic and acute risks for residential and off-site worker receptors show the total acute hazard index (HIA) and chronic hazard index (HIC) for all receptors are well below the acceptable value of 1.0. Based on the above, the emissions from the SVET system have operated in compliance with SCAQMD Rule 1401 and will not pose a significant impact.

- Hazards and Hazardous Materials:
  During construction, excavation of soil was monitored under the authority of the SCAQMD Rule 1166 Program. Composite soil samples of the stockpiles were collected and analyzed for VOCs using EPA

Method 8260B. According to the Uniform Hazardous Waste Manifests submitted, the amount of soil that was impacted with VOCs and transported offsite was about 220 tons. The contractors responsible for excavation implemented a site-specific health and safety plan during the entire field activities. Spill prevention and control measures to prevent or reduce the discharge of pollutants to the environment from leaks or spills were implemented during excavation, stockpiling, loading, and transportation operations. No spills occurred during transport of hazardous waste to the landfill. According to the Uniform Hazardous Waste Manifests, about 220.24 tons or 183.5 cubic yards was excavated from the site deeming it as hazardous waste and taken to a class 1 landfill.

- Transportation and Traffic:
  This project will not alter or significantly increase the traffic load on the streets within the site vicinity. About once a week, workers traveled to and from the site for construction and monitoring of the SVET system. At the initiation of the SVET system construction, several large trucks transported equipment to and from the site. This also occurred during the completion of SVET system construction. However, during construction, truck traffic was limited to the use of end-dump trucks for removal of potentially-contaminated soil. This required approximately 10 trips by trucks occurring over a two-day period. During startup testing of the SVET system, a vacuum truck and small flatbed truck visited the site seven times to change-out the carbon.

  It is anticipated that during operation of the SVET System, carbon change-outs will occur approximately every three to four weeks. For removal of knock-out water (accumulation of small amounts of condensate collected over a period of time), a small flatbed truck will visit the site on a quarterly basis. Weekly site visits by field staff to monitor the SVET system involves a small pickup truck that is parked onsite. The trucks access the site via the 710 freeway, exiting at Washington Boulevard, and turning onto O'Neill Avenue and then onto Jillson Street. This restricts large truck traffic to commercial and industrial areas, avoiding residential neighborhoods.

- Noise:

  The City of Commerce's noise standards for residential areas is 55 decibels (dB) from 7 a.m. to 7 p.m.; 50 dB from 7 p.m. to 10 p.m.; and 45 dB from 10 p.m. to 7 a.m. Noise standards for commercial areas are 65 dB from 7 a.m. to 10 p.m.; and 55 dB from 10 p.m. to 7 a.m. The noise standard for industrial areas is 70 dB anytime. The project has not and will not violate the noise standards set by the City of Commerce.

  According to the noise meter data and noise monitoring data conducted on the SVET system on April 13-16, 2005, it can be concluded that the project will not expose persons to or generation of noise levels in excess of standards established in the local general plan, noise ordinance, or any other applicable sources.

  It is anticipated that the duration of the Interim Measures will be 1 to 2 years, at which time the Corrective Measures Study will be complete and will define the final remedy for the site.

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DTSC Branch Chief Name	DTSC Branch Chief Title

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